

ORIGINAL

MINORITY MEDIA AND  
TELECOMMUNICATIONS COUNCIL

3636 16th Street N.W., Suite BG-54  
Washington, D.C. 20010

RECEIVED

OCT 21 2002

David Honig, Executive Director  
Phone: (202)332-7005 Fax: (202)332-7511  
e-mail: dhonig@crosslink.net

Henry M. Rivera  
Chairperson

FEDERAL COMMUNICATIONS  
OFFICE OF THE SECRETARY

Erwin Krasnow  
Vice Chairperson

October 17, 2002

Lawrence Roberts  
Secretary

Everell C. Parker  
Treasurer

BOARD OF DIRECTORS

Andrew C. Barrett  
Anloinelte Cook Bush  
Jeneba Jalloh Ghalt  
Julia Johnson  
Erwin Krasnow  
Nicolaine Lazzare  
Alex Nogales  
Everell C. Parker  
Henry M. Rivera  
Lawrence Roberts  
Andrew Schwartzman  
S. Jenell Trigg  
Herbert Wilkins

BOARD OF ADVISORS

Raul Alarcon, Jr.  
Eddie Arnold  
Tyrone Brown  
Amador Bustos  
Angela Campbell  
Thomas Castro  
Jannelle Dates  
Belva Davis  
Moctesuma Esparza  
Jerome Fowlkes  
Frank Halfacre  
John Hane  
Janis Hazel  
Ragan A. Henry  
Leo Hindery  
Reginald Hollinger  
Larry Irving  
Eli Noam  
Vincent A. Pepper  
Benjamin Pérez  
Linda Eckard Vilaro  
Anthony Williams  
Edward Young

Hon. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

RE: MM Docket No. 98-204 (Mass Media EEO)

Pursuant to 47 CFR §1.1206, this will disclose that in this permit-but-disclose proceeding, representatives of the Minority Media and Telecommunications Council ("MMTC"), the League of United Latin American Citizens ("LULAC") and the National Association of Black Owned Broadcasters ("NABOB") made an oral ex parte presentation at a Wednesday, October 16, 2002, 4:30 PM meeting with Commissioner Michael Copps and Alexis Johns, Esq., Legal Assistant to Commissioner Copps. Our delegation consisted of Eduardo Peria, Esq., communications counsel for LULAC, James Winston, Esq., Executive Director of NABOB, and myself.

We presented copies of MMTC's ex parte letter (dated October 1, 2002 and filed October 2, 2002) and its exhibits and attachments. We indicated that Mr. Peria was available in the event there were questions concerning the LULAC 1993 Texas television EEO petition to deny (discussed in Mr. Peña's declaration, which is Exhibit 4 to the MTMC ex parte letter). Most of our discussion of the EEO proceeding was devoted to the Blumrosens Study of discrimination in American industry, including broadcasting and cable (relevant excerpts found in Exhibit 1 to the MMTC ex parte letter). We explained its methodology and expressed our view that statistical analyses such as this can be useful in illuminating intentional discrimination. We urged that statistical data, such as that found on Form 395, should remain available for that limited purpose. Finally, we maintained

10/17/02

012

that the extent of discrimination as shown in the Blumrosens study was so profound that the Commission should deem it a high priority to restore strong, enforceable EEO rules. **In** this regard, **we** also make the point that about half of minority radio employees still work at minority-owned stations, although minority owned stations represent only a small fraction of the industry

We also presented a study (being filed today by MMTC for the record in this proceeding) entitled "A Look Towards Advancement: Minority Employment in Cable II" (National Association of Minorities in Communications, September, 2002). We pointed out that the perceptions of minority and female cable employees' perceptions of the extent of discrimination in their companies were a close match to the Blumrosens study's statistical findings of discrimination in the cable industry.

An original and two copies of this letter are being filed with the Secretary.

Respectfully submitted.



David Honig  
Executive Director

cc: Hon. Michael Copps  
Alexis Johns, Esq.  
Richard Zaragoza, Esq.  
Henry Baumann, Esq.

/dh